No. PD-0477-19

ISSAC WILLIAMS,	§	IN THE COURT OF
Appellant	§	COURT OF CRIMINAL APPEALS 9/20/2019
	§	DEANA WILLIAMSON, CLERK
v.	§	CRIMINAL APPEALS
	§	
STATE of TEXAS,	§	
Appellee	§	AUSTIN, TEXAS

STATE'S MOTION FOR EXTENSION OF TIME TO FILE BRIEF ON THE MERITS

TO THE HONORABLE COURT OF CRIMINAL APPEALS:

NOW COMES the State of Texas, by and through Joe D. Gonzales, Criminal District Attorney of Bexar County, Texas, and the undersigned assistant criminal district attorney, with the filing of this motion asking the Court to extend the time for filing the State's brief on the merits in the above styled cause.

I. STATEMENT OF THE CASE

Appellant was indicted and convicted of continuously trafficking a minor under Bexar County cause number 2014-CR-8370B. The Fourth Court of Appeals reversed the trial court's judgment on April 10, 2019 under cause number 04-17-00815-CR. This Court granted the State's petition for discretionary review on August 21, 2019. The State's brief is due on September 20, 2019. This is the State's first request for an extension.

II. REASONS FOR THE REQUEST

The undersigned counsel has substantially finished researching and drafting the brief on the merits and only requests an week extension for edits and revisions.

III. PRAYER

WHEREFORE, PREMISES CONSIDERED, Counsel for the State prays the Court grants an extension of time for an additional <u>7 days</u> to file the petition for discretionary review in this case.

Respectfully submitted,

JOE D. GONZALES

Criminal District Attorney
Bexar County Texas

/s/ Nathan E. Morey

NATHAN E. MOREY Assistant Criminal District Attorney State Bar No. 24074756 101 West Nueva Street, Seventh Floor San Antonio, Texas 78205 Voice: (210) 335-1546

Email: nathan.morey@bexar.org
Attorneys for the State of Texas

CERTIFICATE OF SERVICE

I, Nathan E. Morey, certify that a copy of the foregoing motion has been emailed to Dayna L. Jones and the Office of the State Prosecuting Attorney on September 20, 2019.

/s/ Nathan E. Morey

NATHAN E. MOREY Assistant Criminal District Attorney State Bar No. 24074756 101 West Nueva, Fourth Floor San Antonio, Texas 78205 Voice: (210) 335-2522

Email: nathan.morey@bexar.org

Attorney for the State of Texas

cc:

DAYNA L. JONES
Attorney at Law
State Bar No. 24049450

Email: daynaj33@gmail.com

Attorney for the Defendant/Appellee

STACEY SOULE State Prosecuting Attorney State Bar No. 24031632

Email: Stacey.Soule@SPA.texas.gov